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9 Attorney for Defendant
10 VIRTUAL BARCODE DISTRIBUTION LLC

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,

Plaintiff,

vs.

INTERNET REFERRAL SERVICES,
LLC; EVENT TICKETS CENTER, INC.;
VIRTUAL BARCODE DISTRIBUTION
LLC; ALTAN TANRIVERDI; AND
SECURE TICKETS,

Defendants.

Case No.: 2:24-cv-00377-SPG-(Ex)

**STIPULATION TO EXTEND TIME
FOR DEFENDANT VIRTUAL
BARCODE DISTRIBUTION LLC
TO RESPOND TO FIRST
AMENDED COMPLAINT BY NOT
MORE THAN 30 DAYS (L.R. 83)**

Complaint served: May 13, 2024
Current response date: June 3, 2024
New response date: July 3, 2024

1 Plaintiff AXS GROUP LLC (“Plaintiff” or “AXS”) and Defendant Virtual
2 Barcode Distribution LLC (“VBD”), by and through their respective counsel of record,
3 hereby stipulate as follows:

4 WHEREAS, Plaintiff filed its Complaint on January 16, 2024.

5 WHEREAS, Plaintiff filed its First Amended Complaint on May 6, 2024.

6 WHEREAS, Plaintiff served the First Amended Complaint on Defendant VBD
7 on May 13, 2024, making their current deadline to respond to the Complaint June 3,
8 2024;

9 WHEREAS, in order to allow sufficient time for Defendant, who is represented
10 by counsel who was just recently retained, and so that Defendant can proficiently
11 respond to the Complaint, the parties have agreed that Defendant may have a brief 30-
12 day extension until and including July 3, 2024, to respond to Plaintiff’s Complaint;

13 WHEREAS, Defendant VBD has not made any prior requests for an extension
14 of time to respond to this action.

15 IT IS SO STIPULATED between Plaintiff and Defendant, by and through their
16 undersigned attorneys, that Defendant VBD will have up until and including July 3,
17 2024 to respond to Plaintiff’s Complaint.

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19 Respectfully submitted,
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21 Dated: June 6, 2024 DORSEY & WHITNEY LLP
22
23 /s/ Connor J. Hansen
24 J. Michael Keyes
25 Kent J. Schmidt
26 Connor J. Hansen
27 Attorneys for Plaintiff
28 AXS GROUP LLC

1 Dated: June 6, 2024

COHEN IP LAW GROUP

2 By: /s/ Michael N. Cohen
3 Michael N. Cohen, Esq.
4 Attorney for Defendant
5 Virtual Barcode Distribution LLC
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